

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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Jane Doe,

*Plaintiff,*

No. 1:24-cv-8054

v.

SEAN COMBS, DADDY’S HOUSE RECORDINGS INC.,  
CE OPCO, LLC d/b/a COMBS GLOBAL f/k/a  
COMBS ENTERPRISES LLC, BAD BOY  
ENTERTAINMENT HOLDINGS, INC.,  
BAD BOY PRODUCTIONS HOLDINGS, INC.,  
BAD BOY BOOKS HOLDINGS, INC., BAD BOY  
RECORDS LLC, BAD BOY ENTERTAINMENT LLC,  
BAD BOY PRODUCTIONS LLC, MARRIOTT  
INTERNATIONAL, INC and ORGANIZATIONAL DOES 1-10.

*Defendants.*

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**DECLARATION OF ANTHONY G. BUZBEE IN SUPPORT  
OF PLAINTIFF’S MOTION TO PROCEED ANONYMOUSLY**

I, Anthony G. Buzbee, hereby declare as follows:

1. I am the owner of The Buzbee Law Firm and counsel for Jane Doe.
2. I make this Declaration in support of Plaintiff’s motion to proceed anonymously.
3. If required by this Court, I will disclose Plaintiff’s name to counsel for Defendants.

However, I would request a hearing prior to any such order in light of the threats of violence made against Plaintiff here by Defendants.

4. Plaintiff is by no means the only victim of Mr. Combs to fear violence in retribution for coming forward. My firm currently represents over 200 clients with claims against Mr. Combs. Strikingly, an overwhelming number of these clients – likely in excess of eighty percent – have stated to me or attorneys

at my firm, during their intake process, that Mr. Combs made threats of violence against them (or against the client's family members) if the client disclosed to anyone the facts of the sexual assaults or other acts of Mr. Combs' of which they were a victim.

5. In Ms. Doe's case, Combs threatened Plaintiff, saying that he would kill her if she tried to leave the hotel room where some of the incident took place.

6. For many of the clients referenced above, Mr. Combs' threats of violence were a *primary reason* why they did not speak out or file lawsuits earlier. Most of our clients still fear retribution and have conditioned moving forward on anonymity.

7. With regard to this action, Plaintiff Jane Doe has not spoken publicly about the incidents that underlie the causes of action in her Complaint.

Dated: OCTOBER 23, 2024

/s/ Anthony G. Buzbee  
Anthony G. Buzbee